



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

October 1, 1996

US EPA RECORDS CENTER REGION 5



482990

MONSANTO AGRICULTURAL CO.
DAYTON PLANT
1515 NICHOLAS ROAD
DAYTON, OHIO 45418

REPLY TO THE ATTENTION OF:

RE: Powell Road Landfill, Dayton, Montgomery County, Ohio

Dear Sir or Madam:

The United States Environmental Protection Agency (EPA) is currently working to clean up the Powell Road Landfill, which is a Superfund site located in Huber Heights, Ohio. Superfund is a federal program administered by the EPA that is designed to clean up hazardous substances ("waste") that may pose a threat to human health or the environment. (The full name of the Superfund law is the Comprehensive Environmental Response, Compensation, and Liability Act, or "CERCLA.") Attached is a fact sheet with further information about the site and EPA's efforts to date.

EPA is sending this information to you because you are potentially responsible for (contributing or transporting) a small amount of the waste to the site. EPA has based this determination on information appearing on dump ticket receipts that were records kept by the operator of the Powell Road Landfill site between 1959 and 1984.

Under the Superfund program, EPA has the authority to take actions at sites such as the Powell Road Landfill site to protect public health, welfare, and the environment. In addition, this law permits EPA to request that parties who are responsible for the waste to pay to clean up the site.

Potentially Responsible Parties

Those parties who may be responsible for the waste at sites are referred to as "potentially responsible parties" or Superfund "PRPs." PRPs include individuals, businesses, governmental agencies, and other types of organizations. You may be a PRP if you are:

- 1) a current owner or operator of the site;
- 2) a former owner or operator of the site during the period of waste disposal;
- 3) a party that arranged for the treatment, disposal, or transportation of hazardous substances to the site; or
- 4) a party that transported hazardous substances to a site you selected.

“De Minimis” Settlements

Because EPA believes you may have contributed only a small amount of waste in comparison to the total amount of waste at the site, you may be considered a “de minimis” PRP. Under Superfund, EPA may offer special settlements to de minimis PRPs, which provide many benefits to settling parties. Through a de minimis settlement, you receive:

1. **“Covenant Not to Sue”** - This provision is a promise that the EPA will not bring any future legal actions against you regarding the site and the specific matters named.
2. **“Contribution Protection”** - This provision offers you protection from being sued by **other** PRPs at the site. Frequently, major waste contributors will sue many small waste contributors to recover cleanup costs. A de minimis settlement provides protection from such suits that extends to all issues covered by the settlement.

The amount a de minimis settlor may pay as part of the settlement varies from site to site. In general, the payment amount is the sum of a basic payment and a premium payment. The basic payment is calculated from the estimated cost to clean up the site and the amount of the de minimis party's waste (as a percentage of the total waste at the site). The premium payment varies according to a variety of factors specific to both the site and the settlement. See the enclosed brochure entitled “Superfund and Small Waste Contributors” for more information.

Taken together, contribution protection, the covenant not to sue, and other de minimis settlement terms can provide you with a high level of certainty that your responsibility at a site is fulfilled, and that you are protected from future legal actions related to the matters addressed in the settlement. To date, nearly 5000 individuals, small businesses, and others have entered into de minimis settlements with EPA to resolve their Superfund liability at over 65 sites across the country.

Information to Assist Potentially Responsible Parties

EPA encourages good faith negotiations between PRPs and EPA, as well as among PRPs. To assist in this effort, we have attached a list of the names and addresses of individuals who have received this letter, or previous letters, because they are potentially responsible for cleaning up the waste at the Powell Road Landfill site. It may be useful to talk to or meet with other de minimis parties at the site before talking to EPA or to other non-de minimis PRPs. It is important to note that this list is preliminary; it is **not** a final determination of the parties that may be responsible for the cost of cleaning up the site. EPA may modify this list of PRPs at any time.

To the extent such information is available, EPA will make available copies of a list of the volume of the waste materials contributed by each party. The list is also available for public inspection at the Powell Road information repositories at the addresses listed below. Note that

this list is also preliminary, and does not constitute a final determination of contribution or liability.

Information about the Site

EPA encourages you to become familiar with the site. To assist you in this effort, EPA has compiled certain key documents about the site. Copies of these documents are located at EPA's Region 5 Office at 77 West Jackson Boulevard, Chicago, Illinois, 60604 and at The Dayton Public Library at 215 East Third Street, Dayton, Ohio, 45402, and are available to the public for inspection and comment.

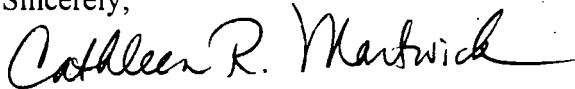
For further information, you can call toll-free (800) 890-4219. This hotline number will provide information regarding upcoming meetings, dates for participating in negotiations, etc.

A de minimis settlement may be in your best interest. EPA encourages you to read carefully the enclosed fact sheet about the site and about de minimis settlements. Please contact EPA in writing by October 22, 1996, to indicate your interest in participating in future negotiations at this site. Direct your written response to:

Ms. Cathleen R. Martwick
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA
Mail Code CM-29A
77 West Jackson Blvd.
Chicago, Illinois 60604

You may respond individually or through a group or committee, if such a group has been formed. If you have any questions concerning this letter, please contact EPA at the hotline number, and EPA will return your, or your attorney's, call.

Sincerely,



Cathleen R. Martwick
Assistant Regional Counsel



**This fact sheet
includes:**

- Results of recently conducted community interviews
- Responses to questions asked by local residents
- Sources of additional information

U.S. EPA is planning to hold an availability session in the near future. Members of the community will be invited to meet informally with U.S. EPA and Ohio EPA representatives to discuss the Powell Road Landfill Superfund site and to ask questions or express concerns.

U.S. EPA and Ohio EPA will announce the availability session through newspaper ads and mailings.



United States
Environmental Protection
Agency

Office of Public Affairs
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Illinois Indiana
Michigan Minnesota
Ohio Wisconsin

Powell Road Landfill Superfund Site Fact Sheet

Huber Heights, Ohio

November 1995

INTRODUCTION

This fact sheet addresses concerns raised by community members about the Powell Road Landfill Superfund site during recent community interviews.

Community Concerns -The United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (Ohio EPA) recently completed a series of community interviews to update the Community Involvement Plan for the Powell Road Landfill Superfund site. This plan is designed to identify the community's level of interest and major concerns and issues regarding the site.

During the interviews, a number of significant concerns and issues were brought to the attention of the agencies. Residents and local officials expressed concerns in the following areas: (1) water quality; (2) private well testing results; (3) health of local residents; (4) the Needmore Road plume; (5) the length of the cleanup process for the Powell Road Landfill Superfund site; and (6) the potentially responsible parties' (PRP) involvement in site activities. A number of individuals directly involved in site activities (federal and state officials) provided information that was used to prepare this fact sheet.

EXPLANATION OF THE SUPERFUND PROCESS

The Superfund process involves several steps to identify sites, investigate and evaluate the problems at sites, select cleanup actions, and design and conduct cleanup actions. During site identification, sites are inspected and evaluated by a state agency or U.S. EPA. Sites are placed on the National Priorities List (NPL) if a serious enough threat is posed to the environment or local residents. Sites then move into the site investigation and evaluation phase, where the nature and extent of contamination is investigated. The Powell Road Landfill Superfund site has been investigated and evaluated. During the next phase, U.S. EPA selects a cleanup action for the site after receiving and reviewing public comments. This phase has also been completed for the Powell Road Landfill Superfund site. During the final phase, the cleanup action selected by U.S. EPA is designed and conducted. The Powell Road Landfill site is currently in this phase of activity.

In most cases, additional investigation and sampling is conducted during the design phase. If PRPs, that is, individuals or companies potentially responsible for creating the contamination problems, can be identified and are willing to cooperate with U.S. EPA, one or more of the PRPs may conduct the site investigation and evaluation, design the cleanup, and conduct the cleanup. State and federal agencies closely monitor all work conducted by the PRPs.

ACTIVITIES AT POWELL ROAD LANDFILL SINCE THE RECORD OF DECISION

Since the Record of Decision (ROD) for the Powell Road Landfill Superfund site was signed on September 30, 1993, PRPs have been designing the cleanup action. Design activities included sampling of select groundwater and private wells every three months. U.S. EPA and Ohio EPA oversight included reviewing and approving all plans and reports, collecting split samples to ensure the accuracy of PRP data, and overseeing field activities. The table below shows how design activities relate to the cleanup action selected for the Powell Road Landfill site.

Components of Cleanup Action	Design Activities: February - September 1995
Landfill cap with liner	Identify extent of landfilled wastes; identify location of wetlands; survey landfill
Groundwater monitoring	Groundwater samples collected from landfill monitoring wells and private wells
Groundwater extraction and treatment	Groundwater pump testing
Remove contaminated soils	Soil sampling
Landfill liquids extraction and treatment	Install landfill gas/liquid wells; sample landfill liquids
Landfill gas extraction and treatment	Soil gas sampling; landfill gas sampling
Flood protection and storm water controls	Review existing floodplain studies; identify existing storm water controls
Fencing and warning signs	Completed June 1994
Deed restrictions	Completed July 1994

GROUNDWATER SAMPLING AND PRIVATE WELL SAMPLING RESULTS

Groundwater Sampling Results - Quarterly groundwater monitoring data (February and May 1995) confirmed that the contaminants in monitoring wells downgradient or south of the landfill and south of the river (north of the Eldorado Plat area) were the same as those found during the remedial investigation (RI). Groundwater contamination in the monitoring wells has not increased and does not appear to have spread further south.

Private Well Sampling Results - Private well sampling results (February and May 1995) have not identified the presence of any volatile organic compounds (VOC) in private wells. Inorganic compounds were identified at several private residential wells; however, most of the compounds were identified upgradient or north of the landfill and at levels less than the federal drinking water standards. Mercury was identified at one private well at 3 micrograms per liter ($\mu\text{g/l}$), which slightly exceeds the drinking water standard of $2.0 \mu\text{g/l}$. Mercury was not identified in any of the monitoring wells adjacent to the landfill, and is not considered to be a compound associated with the landfill.

Analytical results from private well testing are being mailed to the owners of the wells. A representative from the county health department will be available during the availability session to answer any questions regarding the analytical results.

NEEDMORE ROAD PLUME

To determine whether a connection exists between the Powell Road Landfill and the Needmore Road Plume (located approximately 4,000 feet south of the Powell Road Landfill), eight additional monitoring wells were installed south of the landfill and south of the river (north of Eldorado Plat) in 1990. U.S. EPA and Ohio EPA planned the location of these wells with the assistance of the Miami Valley Landfill Coalition hydrogeologist.

In early 1991 these new wells and other wells in the area were sampled. The analytical results did not identify a connection between the Powell Road Landfill and the Needmore Road Plume. Analytical results indicated that the contamination found in the Needmore Road area is a different type of VOC than the VOCs found at the Powell Road Landfill. If the Powell Road Landfill was the source of contamination found at Needmore Road, the same types of contaminants would be found in both areas. Additionally, migration typically results in a decrease in contaminant levels downgradient of the source. However, the levels of contaminants found at the Needmore Road area were up to four-times higher than those found at the Powell Road Landfill.

The ROD specifies that if, in the future, a connection is found that identifies the Powell Road Landfill as the source of contamination in the Needmore Road area, the Needmore Road Plume will be addressed as part of the Powell Road Landfill Superfund site cleanup.

Groundwater monitoring conducted in 1995 has shown the same types of contaminants as those found during the RI, and at similar levels.

PRP INVOLVEMENT AT THE POWELL ROAD LANDFILL SITE

The PRPs, U.S. EPA, and Ohio EPA signed a Consent Order (CO) in June 1994. Under the CO, the PRPs agreed to design the Powell Road Landfill cleanup with U.S. EPA and Ohio EPA oversight. Waste Management Incorporated (WMI) has taken the technical lead for the PRPs to conduct the remedial design. U.S. EPA and Ohio EPA deal directly on a daily basis with a technical representative from WMI. WMI and its contractor, RUST Environment and Infrastructure (RUST), have prepared and submitted the remedial design work plan and supporting documents to U.S. EPA and Ohio EPA, which have been reviewed, revised, and approved by U.S. EPA and Ohio EPA. RUST conducts the field work, including sample collection and analysis, under U.S. EPA and Ohio EPA oversight.

CONCERNS REGARDING THE HEALTH OF LOCAL RESIDENTS

Many local residents expressed strong concerns that their health has been impacted by the Powell Road Landfill Superfund site. The Superfund process provides methods to assess the overall risk a site poses or may pose in the future to human health and the environment. The RI for the Powell Road Landfill found that the site poses a potential risk to human health and the environment and requires a cleanup action to address the threat. U.S. EPA and Ohio EPA then selected the cleanup action that best protects human health and the environment. Determining whether individual health problems are directly associated with a Superfund site is very difficult, and is not the purpose of the Superfund process. U.S. EPA and Ohio EPA do not have the information to confirm or deny that individual health problems of residents near the site are directly related to the site. The Agency for Toxic Substances and Disease Registry performed a general health assessment of local residents. Local residents can call Sheri Hazzard, Public Information Specialist, at (614) 644-6447 to obtain more specific health-related information.

EXPLANATION FOR THE LENGTH OF TIME IT HAS TAKEN FOR THE POWELL ROAD LANDFILL SUPERFUND SITE INVESTIGATION AND CLEANUP ACTION DESIGN

U.S. EPA and Ohio EPA agree that it has taken a long time to investigate the problems at the Powell Road Landfill Superfund site and to design the cleanup action. Several reasons exist for the long schedule. Delays were experienced in the planning phase of the investigation and design activities; it took extra time for U.S. EPA, Ohio EPA, PRPs, and the Miami Valley Landfill Coalition advisor to agree on the details of investigative activities. The project was delayed by the discovery of the Needmore Road Plume and the ensuing investigation to determine if the Powell Road Landfill was the cause. Other delays were caused by negotiations with PRPs to conduct the investigation and design.

INFORMATION REPOSITORIES

U.S. EPA and Ohio EPA establish information repositories to house current and past documentation (technical reports and reference materials) for a specific Superfund site. Local residents can review site information at the information repository. There are a number of information repositories for the Powell Road Landfill Superfund site at the locations listed below.

Dayton Public Library
215 East Third Street
Dayton, OH 45402

Huber Heights Public Library
6363 Brandt Pike
Huber Heights, OH 45424

City of Dayton Water Department
320 West Monument Road
Dayton, OH 45402

Huber Heights City Hall
6131 Taylorsville Road
Huber Heights, OH 45402

For further information about the Powell Road Landfill site, you may contact the following individuals:

U.S. EPA

Janice Bartlett
Remedial Project Manager
U.S. Environmental Protection Agency
Office of Superfund
77 W. Jackson Blvd. (HSR-6J)
Chicago, IL 60604-3590
Telephone: (312) 886-5438

Derrick Kimbrough or Ginny Narsete
Community Involvement Coordinators
U.S. Environmental Protection Agency
Office of Public Affairs
77 W. Jackson Blvd. (P-19J)
Chicago, IL 60604-3590
Telephone: (312) 886-9749 or (312) 886-4359

U.S. EPA Region 5 Toll-free Number: 1-800-621-8431 (9:00 a.m. - 4:30 p.m. Central Time, weekdays)

OHIO EPA

Amy Gibbons
Ohio Environmental Protection Agency
Site Coordinator
Division of Emergency
and Remedial Response
401 East 5th Street
Dayton, Ohio 45402-2911
Telephone: (513) 285-6054

Karen Bryant
Ohio Environmental Protection Agency
Public Involvement Coordinator
Public Interest Center
P.O. Box 1049
1800 Watermark Drive
Columbus, Ohio 43216-1049
Telephone: (614) 644-2160



U.S. Environmental Protection Agency
Region 5
Office of Public Affairs
77 West Jackson Boulevard
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ADDRESS CORRECTION REQUESTED

FIRST CLASS

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Agency

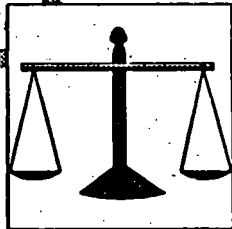
August 1993

Office of Waste Programs Enforcement 5502G

EPA Superfund and Small Waste Contributors



*De Minimis
De Minimis
De Minimis
De Minimis
De Minimis*



Have you been contacted by the U.S. Environmental Protection Agency or another party regarding your possible involvement with a Superfund site? If you believe the waste that you contributed to the site was minimal, you should learn about "de minimis settlements."

This pamphlet describes what Superfund is, who Potentially Responsible Parties are, and why a de minimis settlement may be to your advantage.

How did I become a potentially responsible party?

"Potentially responsible parties" (PRPs) are individuals or companies who may be responsible for all or part of the contamination at a site. PRPs include individuals, businesses, local, state, or federal governmental agencies, and other types of organizations. You may be identified as a PRP if you are:

- 1) a current owner or operator of the site;
- 2) a former owner or operator of the site during the period of disposal;
- 3) a party that arranged for the treatment, disposal, or transportation of hazardous substances to the site;
- 4) a party that transported hazardous substances to a site you selected.

If you fit one of these descriptions, you may be a PRP even if you were unaware that your waste was disposed of at the site, or did not dispose of it yourself.

What does "de minimis" mean?

At many sites there are PRPs who may have contributed only a very small amount of waste to a site. EPA may consider these parties "de minimis" because their contribution is minimal compared to the other waste at the site. For example, an individual who contributed one percent or less of the waste at a site may be considered a *de minimis* party.

In recognition of their relatively small contribution of waste, and to help ensure that these *de minimis* parties do not get drawn into lengthy and expensive lawsuits, EPA may offer a special type of settlement to these types of parties.

Whether and how individuals qualify for a *de minimis* settlement depends on a variety of site-specific factors. However, in general, you may qualify for a *de minimis* settlement if:

- the amount of waste you contributed is minimal in comparison to the other hazardous substances at the site;
- the toxic or other hazardous effects of the waste you contributed are minimal in comparison to the other hazardous substances at the site; and
- the settlement is in the public interest, and involves only a minor portion of the response costs at the site.

Or, if you are the owner of a site, you may qualify for another type of *de minimis* settlement if:

- as the owner of the site, you did not conduct or permit the generation, transportation, storage, treatment, or disposal of any hazardous substances at the facility; and
- at the time of purchase, you did not know, or had no reason to know, that the property was used for the generation, transportation, storage, treatment, or disposal of a hazardous substance.

What are the benefits of this type of settlement?

Although EPA may go to court to require PRPs to pay for (or perform) a cleanup, the Agency often prefers to settle its claims without resort to expensive court action. Settlements save both time and money for all parties involved.

De minimis settlements can provide several benefits, including:

"Covenant Not to Sue" - This provision is a promise that the EPA will not bring any future legal actions against the *de minimis* party regarding the site and the specific matters named.

"Contribution Protection" - This provision offers protection to the *de minimis* settlor from being sued by other PRPs at the site. Frequently, major waste contributors will sue many small

waste contributors to recover their cleanup costs. A *de minimis* settlement provides protection from such suits that extends to all matters covered by the settlement.

Taken together, contribution protection, the covenant not to sue, and other *de minimis* settlement terms provide settlers with a high level of certainty that their responsibilities at the site are fulfilled, and that they are protected from future legal actions related to those matters addressed by the settlement. To date, nearly 5000 individuals, small businesses, and others have entered into *de minimis* settlements with EPA to resolve their Superfund liability at more than 65 sites across the country.

What other settlement provisions are important?

"Payments and Premiums" - Although the amount a *de minimis* settlor may pay varies from site to site, in general, the payment amount is calculated by combining a basic payment and a premium payment. The basic payment is based on the estimated cost to clean up the site and the amount of the *de minimis* party's waste as a percentage of the total waste at the site.

The premium payment is associated with the protection from further EPA lawsuits that is provided by the "covenant not to sue." Premium amounts vary according to a variety of factors specific to both the site and the settlement, but typically range from 50 - 100% of the basic payment.

"Reopeners" - If you enter into a *de minimis* settlement with the EPA, you will likely be asked to certify that your waste contribution is the amount (and type) that you claim. After the settlement is finalized, if new information indicates that your contribution is actually greater than you originally certified, the settlement may be "reopened" for renewed consideration. Other types of reopeners may also be included.

What is Superfund?

Superfund is a federal program, administered by the Environmental Protection Agency, that is designed to clean up hazardous substances (or "waste") that may pose a threat to human health or the environment. The full name of the law is the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

Many Superfund sites are frequently areas or facilities where solvents, sludges, heavy metals, or other wastes have been disposed. These sites range in size from a 1/4-acre metal plating shop to a 250-square mile mining complex. Contamination from these sites is often found in the soil, groundwater, and/or nearby streams and lakes.

Who pays for cleanups?

When Congress enacted Superfund, it intended to "make the polluters pay" for the cost of cleaning up these sites. To achieve this goal, EPA seeks to hold those parties who contributed to the contamination responsible for the cost of cleanup. Such parties may be asked to help pay for the cleanup of a site even if they acted in full accordance with the law at the time they disposed of the waste.

Superfund encourages EPA to settle with these responsible parties outside of court, but also authorizes the Agency to bring actions in court to require responsible parties to pay for (or perform) the cleanup.

In some cases, when no responsible parties can be identified, the cost is borne by the taxpayers. At these sites, the cleanup is paid for out of a Trust Fund set up by Congress to address this problem.

What is Alternative Dispute Resolution?

Alternative Dispute Resolution (ADR) is a collection of methods to resolve legal disputes outside of court. ADR normally involves the use of neutral third parties who are skilled in a variety of ADR approaches to increase the effectiveness of settlement discussions.

At sites where numerous *de minimis* parties have been identified, it may be most efficient for such parties to coalesce into a group and appoint a representative to negotiate with EPA and/or the other PRPs at the site. A neutral ADR professional can assist greatly in the formation of a *de minimis* group, in the dissemination of information, and most importantly, in the negotiations process.

Where can I get more information?

To find out more about *de minimis* settlements, and how you might be involved, contact the nearest Regional U.S. Environmental Protection Agency Superfund program office. Ask to speak to the attorney, project manager, or community relations representative assigned to your site.



Office of Solid Waste and Emergency Response
Office of Waste Programs Enforcement
August 1993



United States
Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, IL 60604

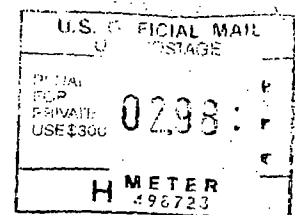
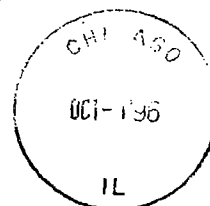
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PO BOX 100
100 NICHOLAS ROAD
DAYTON OHIO 45418

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MANAGEMENT BRANCH
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Is your RETURN ADDRESS completed on the reverse side?	SENDER: <ul style="list-style-type: none">■ Complete items 1 and/or 2 for additional services.■ Complete items 3, 4a, and 4b.■ Print your name and address on the reverse of this form so that we can return this card to you.■ Attach this form to the front of the mailpiece, or on the back if space does not permit.■ Write "Return Receipt Requested" on the mailpiece below the article number.■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: <div>MONSANTO AGRICULTURAL CO. DAYTON PLANT 1515 NICHOLAS ROAD DAYTON, OHIO 45418</div>		4a. Article Number PS17 227 379	
	5. Received By: (Print Name)		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
	6. Signature: (Addressee or Agent) X		7. Date of Delivery	
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PS Form 3811, December 1994		Domestic Return Receipt		

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PS Form 3800, April 1995
D. Shepard sm-5J
Powell